

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION- FLINT**

In Re:

Rachael Gabrielle Osborn,

Debtor.

Case No. 16-31659

Chapter 13

Hon. Daniel S. Opperman

**RESPONSE TO MOTION TO DISMISS FOR FAILURE TO MAKE PLAN  
PAYMENTS**

NOW COMES Debtor, Rachael Gabrielle Osborn, by and through her attorney, Juanita L. Massey, and for her response to the Motion to Dismiss for Failure to Make Plan Payments hereby states as follows:

1. In response to Paragraph 1 of the Motion, Debtor admits the allegations contained therein.
2. In response to Paragraph 2 of the Motion, Debtor admits the allegations contained therein.
3. In response to Paragraph 3 of the Motion, Debtor admits the allegations contained therein; but, further states that the Debtor has had recent income/employment changes and she has been struggling to pay normal living expenses.
4. In response to Paragraph 4 of the Motion, Debtor admits the allegations contained therein.

5. In response to Paragraph 5 of the Motion, Debtor states the following:

- a. Debtor has not had sufficient income to make the plan payments.
- b. Debtor is trying to work overtime hours to earn more income and is searching for a second job.
- c. Debtor is unsure at this time when the delinquency will be corrected.

WHEREFORE, Debtor respectfully requests that this Honorable Court deny the Trustee's Motion to Dismiss for Failure to Make Plan Payments.

Respectfully submitted,

Dated: April 28, 2017

/s/ Juanita L. Massey  
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